

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION**

In re:	Bankruptcy No. 22-10759-elf
Melvin Geiger, Debtor.	Chapter 13
Lakeview Loan Servicing, LLC, Movant, v. Melvin Geiger, Debtor/Respondent,	Related to Doc. No. 2
Kenneth E. West, Esquire, Trustee/Respondent.	

**LAKEVIEW LOAN SERVICING, LLC'S OBJECTION TO CONFIRMATION OF
DEBTOR'S CHAPTER 13 PLAN**

Secured Creditor, Lakeview Loan Servicing, LLC ("Lakeview Loan Servicing") by and through its undersigned counsel, hereby objects to the proposed Chapter 13 Plan of Debtor, Charles Melvin Geiger, and in support thereof alleges as follows:

1. Debtor, Melvin Geiger ("Debtor"), filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on March 28, 2022.
2. Lakeview Loan Servicing holds a security interest in the Debtor's real property located at 1113 Edmonds Ave Drexel Hill, Pennsylvania 19026 (the "Property"), by virtue of a Mortgage Recorded with the Public Records of Delaware County, PA on March 18, 2019.
3. Said Mortgage secures a Note in the amount of \$286,020.00.

4. Upon information and belief, it is anticipated that Lakeview Loan Servicing's Proof of Claim will include a pre-petition arrearage of approximately \$74,160.20. A true and correct copy of the pre-petition arrearage is attached hereto as Exhibit "A."
5. On March 28, 2022, Debtor filed a Chapter 13 Plan (the "Plan"). A true and correct copy of the Plan is attached hereto as Exhibit "B."
6. The Plan fails to account for the full pre-petition arrearage of \$74,160.20, as it only provides a total of \$66,000.00 that will be paid to Secured Creditor through the Plan. See Exhibit "B."
7. Thus, the Plan is understated as it does not accurately reflect the amount of the pre-petition arrearage which will be paid through the Chapter 13 Trustee's Office.
8. Accordingly, pursuant to 11 U.S.C.A. § 1325(a)(5) Lakeview Loan Servicing hereby objects to Debtor's proposed Plan due to the fact that the value of the property to be distributed thereunder will be less than the allowed amount under the claim. See 11 U.S.C.A. § 1325(a)(5)(B)(ii).

WHEREFORE, Movant, Lakeview Loan Servicing, LLC ("Lakeview Loan Servicing"), respectfully requests that this Court not confirm the Chapter 13 Plan of Debtor, Melvin Geiger.

Robertson, Anschutz, Schneid, Crane & Partners, PLLC

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Lakeview Loan Servicing, LLC,	Related to Doc. No. 2
Movant,	
v.	
Melvin Geiger,	
Debtor/Respondent,	
Kenneth E. West, Esquire,	
Trustee/Respondent.	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 19, 2022, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and a true and correct copy has been served via CM/ECF or United States Mail to the following parties:

Melvin Geiger
1113 Edmonds Avenue
Drexel Hill, PA 19026

Brad J. Sadek
Sadek And Cooper
1315 Walnut Street
Suite 502
Philadelphia, PA 19107

Kenneth E. West
1234 Market Street - Suite 1813
Philadelphia, PA 19107

United States Trustee
Office of United States Trustee
Robert N.C. Nix Federal Building

900 Market Street
Suite 320
Philadelphia, PA 19107

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By: /s/Charles Wohlrab

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Date: May 19, 2022